

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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KVAERNER PHILADELPHIA SHIPYARD, INC., )  
  )  
  )  
Plaintiff,                                    )  
  )  
  )         No. 02-CV-3710  
v.    )  
  )  
PHILADELPHIA METAL TRADES COUNCIL, *et al.*, )  
  )  
  )  
Defendants.                                    )  
  )  
\_\_\_\_\_  
)

**MOTION FOR ADMISSION *PRO HAC VICE***

COMES NOW, Robert Curley and David D. Capuano, duly admitted to practice and a member in good standing of the Supreme Court of Pennsylvania and this Court and counsel for Defendant Philadelphia Metal Trades Council, Ron Ault and Philip Rowan, and hereby move this Honorable Court to permit Robert Matisoff and Keith R. Bolek to appear *pro hac vice* on behalf of the Defendant in this cause. We will act as local counsel for the Defendants in this matter. The grounds for this motion are set forth in the attached Joint Declaration in Support of Motion for Admission *Pro Hac Vice*.

Dated: June 20, 2002

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Robert Curley (Bar No. 55760)  
David D. Capuano (Bar No. 70238)  
O'DONOGHUE & O'DONOGHUE  
Constitution Place, Suite 515  
325 Chestnut Street  
Philadelphia, PA 19106  
(215) 629-4970

Attorney for Defendant

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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KVAERNER PHILADELPHIA SHIPYARD, INC., )  
Plaintiff, )  
v. ) No. 02-CV-3710  
PHILADELPHIA METAL TRADES COUNCIL, *et al.*, )  
Defendants. )

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**JOINT DECLARATION OF ROBERT MATISOFF AND  
KEITH R. BOLEK IN SUPPORT OF  
MOTION FOR ADMISSION *PRO HAC VICE***

Co-counsel for the Defendant, in support of their admission *pro hac vice*, declare as follows:

1. Robert Matisoff is a partner and Keith R. Bolek is an associate with the law firm of O'Donoghue & O'Donoghue, 4748 Wisconsin Avenue, N.W., Washington, D.C. 20016, telephone 202-362-0041, facsimile 202-237-1200.
2. The Defendants in this action, Philadelphia Metal Trades Council ("PMTC"), Ron Ault and Philip Rowan, desires to have Mr. Matisoff and Mr. Bolek of the firm of O'Donoghue & O'Donoghue and the attorneys identified above represent them in this matter.
3. Robert Matisoff and Keith R. Bolek are members in good standing of the Bar of the District of Columbia and the Bar of the State of Maryland. In addition, Robert Matisoff is a member of the Bar of the Commonwealth of Virginia.

4. Robert Matisoff has been admitted to practice before, and is presently a member in good standing of, the bars of the United States District Court for the District of Columbia and the United States Court of Appeal for the District of Columbia Circuit.

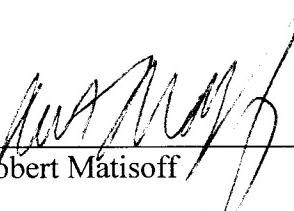
5. Keith R. Bolek has been admitted to practice before, and is presently a member in good standing of, the bars of the United States District Court for the District of Columbia as well as the United States Court of Appeals for the Third and D.C. Circuits.

6. There are no disbarment proceedings presently pending against either Robert Matisoff or Keith Bolek, nor have any disbarment proceedings ever been instituted against either of them. No certificate of any privilege to appear and practice before any regulatory or administrative body has ever been suspended or revoked for either of them.

**VERIFICATION**

I am the applicant in this matter. I have read the above Declaration, and the matters stated in it are true of my own knowledge. I declare under penalty of perjury that the above is true and correct.

Dated: June 19, 2002

By:   
Robert Matisoff

Dated: June 19, 2002

By:   
Keith R. Bolek

O'DONOGHUE & O'DONOGHUE  
4748 Wisconsin Avenue, N.W.  
Washington, D.C. 20016  
(202) 362-0041 – telephone  
(202) 237-1200 – facsimile



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D.C. 20001  
202/879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

**KEITH R. BOLEK**

was on the 4th day of June, 1999,  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name and  
affixed the seal of this Court  
at the City of Washington, D.C.  
this 18th day of  
June, 2002.

GARLAND PINKSTON, JR., CLERK

By: Rocky Cl.  
Deputy Clerk



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D.C. 20001  
202/879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

**ROBERT MATISOFF**

was on the 1st day of January, 1974,  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name and  
affixed the seal of this Court  
at the City of Washington, D.C.  
this 18th day of  
June, 2002.

GARLAND PINKSTON, JR., CLERK

By: Rudy Al.  
Deputy Clerk

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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KVAERNER PHILADELPHIA SHIPYARD, INC., )  
Plaintiff, )  
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Defendants. )

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**ORDER GRANTING MOTION  
FOR ADMISSION *PRO HAC VICE***

The Court having considered the papers submitted in support of and in opposition to the Motion of David D. Capuano for an Order granting permission for Robert Matisoff and Keith R. Bolek to appear as counsel *pro hac vice* for Defendants Philadelphia Metal Trades Council, Ron Ault and Philip Rowan, in association with Robert Curley and David D. Capuano, attorneys of record in the above-entitled matter, and good cause appearing, THEREFORE,

IT IS ORDERED that the Motion for Admission *Pro Hac Vice* is GRANTED.

Dated: \_\_\_\_\_

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**HONORABLE WILLIAM H. YOHN, JR.  
UNITED STATES DISTRICT COURT JUDGE**

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

\_\_\_\_\_  
KVAERNER PHILADELPHIA SHIPYARD, INC., )  
Plaintiff, )  
v. ) No. 02-CV-3710  
PHILADELPHIA METAL TRADES COUNCIL, *et al.*, )  
Defendants. )  
\_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for Admission *Pro Hac Vice*, Joint Declaration of Robert Matisoff and Keith R. Bolek in Support thereof, and proposed Order have been served by hand, this 20<sup>th</sup> day of June, 2002, upon the following:

Kelly A. Wallenda, Esq.  
BALLARD SPAHR ANDREWS & INGERSOLL, LLP  
1735 Market Street, 51<sup>st</sup> Floor  
Philadelphia, PA 19103-7599

Michael N. Katz, Esq.  
MERANZE & KATZ  
225 S. 15<sup>th</sup> Street, 12<sup>th</sup> Floor  
Philadelphia, PA 19102-3977

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Robert Curley